

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

CASE NO. 18-08572

Jurgita Paulauskas
fka Jurgita Sriubenaite;

CHAPTER 7

JUDGE A. Benjamin Goldgar

Debtor(s).

NOTICE OF MOTION

PLEASE TAKE NOTICE that on June 15, 2018, at 1:00 pm, or soon thereafter as counsel may be heard, I shall appear before the Honorable A. Benjamin Goldgar or any judge sitting in his/her stead, in the courtroom usually occupied by him/her at 1792 Nicole Lane, Round Lake Beach, IL 60073, and move to present the attached motion.

/s/ Sean Jordan

Attorney for Creditor

NOTE: This law firm is deemed to be a debt collector.

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2018, a true and correct copy of the foregoing NOTICE OF MOTION was served:

Via the Court's ECF system on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Alexey Y. Kaplan, Debtor's Counsel

Ilene F. Goldstein, Esq, Trustee

Patrick S Layng, United States Trustee

And by regular US Mail, postage pre-paid on:

Jurgita Paulauskas fka Jurgita Sriubenaite, 20877 Birch Lane, Deerfield, IL 60015

/s/ Thomas Girard

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MOTION FOR RELIEF FROM AUTOMATIC STAY

Now comes Specialized Loan Servicing LLC, secured creditor herein, by and through its attorneys, ANSELMO LINDBERG & ASSOCIATES LLC, and moves for entry of the attached Order Granting Relief from the Automatic Stay and in support thereof respectfully states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. § 1334 and the general orders of the Northern District of Illinois.
2. Venue is fixed in this Court pursuant to 28 U.S.C. § 1409.
3. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(G).
4. The debtor filed a petition for relief under Chapter 7 on March 24, 2018.
5. Specialized Loan Servicing LLC holds a mortgage secured by a lien on debtor's real estate commonly known as 774 River Mill Pkwy #774, Wheeling, Illinois 60090-4202.
6. Andrius Paulauskas signed the Mortgage but did not sign the Note and may have a legal interest in the property.
7. There is no equity in the property as the value is \$230,000.00 (per Schedule A/B) and the total payoff amount as of May 21, 2018, is \$265,861.73. Debtor has a 50% interest in the subject property.
8. Per the statement of intentions, the property is being surrendered.

9. Due to the debtor surrendering the property to the creditor and the failure of the debtor to make timely payments, there is cause for the automatic stay to be modified as to the movant pursuant to 11 U.S.C. §§ 362(d)(1).
10. The property is not necessary to an effective reorganization.
11. The movant requests the Court order that Rule 4001(a)(3) is not applicable.

Specialized Loan Servicing LLC services the loan on the Property referenced in the Motion. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant or Movant's successor or assignee. Movant, directly or through an agent, has possession of the Note. The Note is either made payable to Movant or has been duly endorsed. Movant is the original mortgagee or beneficiary or the assignee of the Mortgage/Deed of Trust.

WHEREFORE, Movant prays for an entry of the attached Order Granting Relief from the Automatic Stay and for such further relief as this Court deems proper.

Specialized Loan Servicing LLC

/s/ Sean Jordan

Anselmo Lindberg & Associates
1771 W. Diehl Rd., Ste. 120
Naperville, IL 60563-4947
630-453-6960 | 866-402-8661 | 630-428-4620 (fax)
bankruptcy@AnselmoLindberg.com
Firm File Number: B18050055

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